

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

FREESCALE SEMICONDUCTOR, INC.,

PLAINTIFF,

§§§

V.

§ § 2

**CAUSE NO. A-12-CV-644-LY
(LEAD CASE)**

AMTRAN TECHNOLOGY CO., LTD.;
AMTRAN LOGISTICS, INC.;
CSR TECHNOLOGY, INC.; ENVISION
PERIPHERALS, INC., FUNAI
CORPORATION, INC.; FUNAI
ELECTRIC CO., LTD.; MARVELL
SEMICONDUCTOR, INC.; MEDIATEK,
INC.; MEDIATEK USA INC.; SANYO
ELECTRIC CO., LTD.; SANYO NORTH
AMERICA CORPORATION; SANYO
MANUFACTURING CORPORATION;
TOP VICTORY ELECTRONICS
(TAIWAN) CO., LTD.; TOP VICTORY
ELECTRONICS (FUJIAN) CO., LTD.;
TPV TECHNOLOGY LIMITED; TPV
INTERNATIONAL (USA) INC.; VIZIO,
INC.; AND ZORAN CORPORATION.

DEFENDANTS.

**DECLARATION OF ANDREA PACELLI IN SUPPORT OF DEFENDANTS' JOINT
REPLY CLAIM CONSTRUCTION BRIEF**

I, Andrea Pacelli, declare:

1. I am an attorney with Wilmer Cutler Pickering Hale and Dorr LLP, representing
Mediatek Inc. and Mediatek USA Inc. in the above-captioned action. This declaration is based
on a reasonable investigation and on information currently available to me.

2. I submit this declaration on behalf of Defendants in support of Defendants' Joint

Reply Claim Construction Brief.

3. Attached hereto as exhibits are true and correct copies of the documents identified in the table below.

Exhibit	Document
A-12	Excerpt from file history of U.S. Patent No. 5,467,455 (Amendment dated 5/19/95)
B-7	Transcript of deposition of Sanjay K. Banerjee, Ph.D. (July 3, 2013)
C-5	Excerpt from THE OXFORD UNIVERSAL DICTIONARY, 1604 (C.T. Onions, ed., 3rd ed. 1955)
C-6	Excerpt from MERRIAM WEBSTER'S COLLEGIALE DICTIONARY, 938 (10TH ED. 1997)
D-27	Excerpt from file history of U.S. Patent No. 7,927,927 (Amendment dated 9/17/2008)

I declare under penalty of perjury that, after reasonable investigation and to the best of my knowledge, the foregoing is true and correct.

Executed this 26th day of August, 2013



Andrea Pacelli

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(b)(1) on August 26, 2013:

All others will be served via e-mail.

/s/ Keith L. Slenkovich
Keith L. Slenkovich